

THE LAW OFFICES OF
J O S E P H A . B O N D Y

JOSEPH A. BONDY

STEPHANIE R. SCHUMAN
(OF COUNSEL)

1776 BROADWAY
SUITE 2000
NEW YORK NY 10019
TEL 212.219.3572

JOSEPHBONDY@MAC.COM

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The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, N.Y. 10007

Re: *United States v. Lev Parnas and Andrey Kukushkin, 19-cr-725 (JPO)*

Dear Judge Oetken:

Defendants Lev Parnas and Andre Kukushkin jointly request, pursuant to Fed. R. Crim. P. 24(a)(2)(A), that the Court allow the attached Jury Questionnaire to be distributed in advance of the Court's examination of prospective jurors.

We believe that the use of a questionnaire will aid the Court and parties in several ways, including but not limited to, ensuring that the same information is possessed about each juror in the entire pool; helping to ascertain particularized information about prospective jurors, including information from jurors who are reluctant to talk in open court; drawing out more candid responses; minimizing the risks of potential juror cross-contamination; and streamlining the *voir dire* process as a whole. Indeed, in its proposed *voir dire*, the Government suggests that:

In light of the fact that many of these individuals are public figures, including President Trump, the Government anticipates that many prospective jurors will recognize some of these individuals and will have formed opinions about them. The Government therefore respectfully requests that the Court question

individual jurors regarding their opinions of these individuals outside of the hearing of the other prospective jurors.

See Dkt, 217, at p. 6, fn. 1.

This process could be significantly truncated if the juror questionnaire is distributed to prospective jurors in advance. The defendants would bear the effort of preparing the questionnaire for distribution to the entire pool.

Should the Court decline to allow distribution of the questionnaire, we respectfully request that the questions contained herein, to the extent deemed proper, be asked of prospective jurors pursuant to Fed. R. Crim. P. 24(a)(2)(B).

Thank you for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy
Stephanie R. Schuman
Co-Counsel to Lev Parnas

cc: All Counsel (By ECF)